

Comment Register
Proposed Phosphorus Management Tool Regulation
October 21-25, 2013

No.	Source	Date Received	Form	Date Acknowledged	Form of Acknowledgment
21	Michael S. Thomas	10/21/13	Postcard	10/21/13	Mail
22	Randall Marine	10/21/13	Postcard	10/21/13	Mail
23	Andrew Mason & Valerie Walthert	10/21/13	Postcard	10/21/13	Mail
24	Jeff Green	10/21/13	Postcard	10/21/13	Mail
25	Max Schnoor	10/21/13	Postcard	10/21/13	Mail
26	Philip S. Perdue	10/21/13	Form Letter	10/21/13	Mail
27	Gerald C. Ketterman	10/21/13	Form Letter	10/21/13	Mail
28	David Andrew Wilkins	10/21/13	Form Letter	10/21/13	Mail
29	Tommy and Donna Smith	10/22/13	Postcard	10/22/13	Mail
30	Sherry Collier	10/22/13	Postcard	10/22/13	Mail
31	John Willoughby	10/22/13	Postcard	10/22/13	Mail
32	Lloyd B. Brittingham	10/22/13	Letter	10/22/13	Mail
33	Andrew W. Booth	10/22/13	Form Letter	10/22/13	Mail
34	Tammy S. Pollock	10/22/13	Form Letter	10/22/13	Mail
35	Denise G. Calloway	10/22/13	Form Letter	10/22/13	Mail
36	Thomas M. Fisher	10/22/13	Form Letter	10/22/13	Mail
37	Michael B. Phillips	10/22/13	Form Letter	10/22/13	Mail
38	Sonya Brittingham	10/22/13	Form Letter	10/22/13	Mail
39	Bobbie Reed	10/23/13	Postcard	10/23/13	Mail
40	Danny Reed	10/23/13	Postcard	10/23/13	Mail
41	John F. Luthy, III	10/23/13	Postcard	10/23/13	Mail
42	Harry C. Taylor	10/23/13	Postcard	10/23/13	Mail
43	Susie A. Farlow	10/23/13	Form Letter	10/23/13	Mail
44	Don B. Hughes	10/23/13	Form Letter	10/23/13	Mail
45	Ms. Miriam B. Hughes	10/23/13	Form Letter	10/23/13	Mail
46	Ms. Leslie White Hughes	10/23/13	Form Letter	10/23/13	Mail
47	Richard W. Leavitt	10/23/13	Form Ltr w/note	10/23/13	Mail
48	David M. Barnes	10/23/13	Form Letter	10/23/13	Mail
49	Kathleen M. Adkins	10/23/13	Form Letter	10/23/13	Mail
50	Arthur R. Marvel	10/23/13	Form Letter	10/23/13	Mail
51	Lloyd T. Gregory	10/23/13	Form Letter	10/23/13	Mail
52	Bruce Callaway	10/23/13	Form Letter	10/23/13	Mail
53	Andrea H. Williams	10/23/13	Form Letter	10/23/13	Mail
54	G. Gorman Brittingham	10/23/13	Form Ltr w/note	10/23/13	Mail
55	Robert M. Davis	10/23/13	Form Letter	10/23/13	Mail
56	Albert L. Murray	10/23/13	Form Letter	10/23/13	Mail
57	Laurence Townsend, Jr.	10/23/13	Form Letter	10/23/13	Mail
58	Shirley Townsend	10/23/13	Form Letter	10/23/13	Mail
59	Tommy and Donna Smith	10/24/13	Postcard	10/24/13	Mail
60	Glenn Holland	10/24/13	Postcard	10/24/13	Mail

61	Deborah Ford	10/24/13	Form Letter	10/24/13	Mail
62	Glenn Staehli, Jr.	10/24/13	Form Letter	10/24/13	Mail
63	Tracy A. Patey	10/24/13	Form Letter	10/24/13	Mail
64	Fred A. Althaus	10/24/13	Form Letter	10/24/13	Mail
65	Melody W. Hudson	10/24/13	Form Letter	10/24/13	Mail
66	Mark A. Hudson	10/24/13	Form Letter	10/24/13	Mail
67	Chelsea Hudson	10/24/13	Form Letter	10/24/13	Mail
68	Christopher A. Hudson	10/24/13	Form Letter	10/24/13	Mail
69	Megan Hudson	10/24/13	Form Letter	10/24/13	Mail
70	Marguerite Davis	10/24/13	Petition	10/24/13	Mail
71	Alan Hudson	10/24/13	Petition	10/24/13	Mail
72	Kristen D. Hudson	10/24/13	Petition	10/24/13	Mail
73	Roger Hudson	10/24/13	Petition	10/24/13	Mail
74	Michelle Chesnik	10/24/13	Petition	10/24/13	Mail
75	Paul D. Chesnik	10/24/13	Petition	10/24/13	Mail
76	John Taylor	10/24/13	Petition	10/24/13	Mail
77	Harry C. Taylor	10/24/13	Petition	10/24/13	Mail
78	Kathryn Danko Lord	10/24/13	Petition	10/24/13	Mail
79	Jack Lord	10/24/13	Petition	10/24/13	Mail
80	Steven M. Gray	10/24/13	Petition	10/24/13	Mail
81	Harry W. Wimbrow	10/24/13	Petition	10/24/13	Mail
82	John Bruning, Jr.	10/24/13	Petition	10/24/13	Mail
83	Randy Blevins	10/24/13	Petition	10/24/13	Mail
84	John Windsor	10/24/13	Petition	10/24/13	Mail
85	Libby H. Nagel	10/24/13	Petition	10/24/13	Mail
86	Richard Hutchison	10/24/13	Petition	10/24/13	Mail
87	Paul T. Swann	10/24/13	Petition	10/24/13	Mail
88	Alan K. Hutchison	10/24/13	Petition	10/24/13	Mail
89	Ethan Hutchison	10/24/13	Petition	10/24/13	Mail
90	Paul Hutchison, Sr.	10/24/13	Petition	10/24/13	Mail
91	Tim Pilkowski	10/24/13	Petition	10/24/13	Mail
92	Rich Johnson	10/24/13	Petition	10/24/13	Mail
93	Wilbur Levengood	10/24/13	Petition	10/24/13	Mail
94	JD Crook	10/24/13	Petition	10/24/13	Mail
95	Mark Eberspacher	10/24/13	Petition	10/24/13	Mail
96	Lee Lyons	10/24/13	Petition	10/24/13	Mail
97	Mary Beth Carossa	10/24/13	Petition	10/24/13	Mail
98	Robert R. Mills	10/24/13	Petition	10/24/13	Mail
99	Frank Covey	10/24/13	Petition	10/24/13	Mail
100	Nicolas Nemil	10/24/13	Petition	10/24/13	Mail
101	Carol P. Rose	10/24/13	Petition	10/24/13	Mail
102	Wm J Edwards	10/25/13	Email/Letter	10/25/13	Email
103	Clifton G. Taylor, III	10/25/13	Letter	10/25/13	Mail
104	Kenny Bounds	10/25/13	Postcard	10/25/13	Mail
105	Tia Wilson	10/25/13	Postcard	no address	
106	Helene Pendleton	10/25/13	Postcard	no address	
107	Milt Catlin	10/25/13	Form Letter	10/25/13	Mail

108	Timothy S. Curry	10/25/13	Form Letter	10/25/13	Mail
109	No Name	10/25/13	Postcard	no address	
110	Tom Johnson	10/25/13	Email/Letter	10/25/13	Email

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorus Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

My comment to this decision is that you need to rethink this. The reports coming from UMES is not quite clear. You need to check the quality of the Potomack. We responded to an oil spill about 15 years ago and it wasn't looking too healthy then. Part of the stuff we found floating in the river was a dead pig. Please do some more research on this before you make your decision. Thank you.

A.S. That oil spill was on the Anna Costello river

Sincerely,
Name: Michael S. Thomas
Address: 30421 Charles Barnes Rd.
Westover, Md. 21071
Phone: 443-523-6364
Email: _____



Our Farms. Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



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Dear Secretary Hance:

I am a small farm I have to follow all the rules. I have
beef cows & pig. Maryland is
Whenever I go to Cambridge, I have asked is there any help
I can get. But the tell me I don't have enough land.
So I have to pay for any thing that I want. They go
I plant rice on my own. What no cost sharing see
any corner crop sharing. I know a farmer don't own the land
but maybe how much help he can get.

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OCT 21 2013

OFFICE OF THE SECRETARY
Our Farms. Our Future

Sincerely,

Name: Raveland E. Marine
Address: 5827 Salisbury - Beloe Rd
Laurel De 19073
Phone: 410-883-2149
Email: _____

22

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

We feel that more research should be done before these new regulations are put into place. As cattle farmers these new regulations make our manure management more complicated. What should we do with our manure if we can not use it as fertilizer for our crops.

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OCT 21 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: Andrew Mason + Valerie Walther
Address: 24850 Porters Grove Rd
Worton MD 21078
Phone: 410 490 1276
Email: amason247@gmail

23

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard! Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

After hearing the regulations for the New Phosphorous Management tool regulation, seems to me that 150 is not enough phosphorous to grow a substantial crop. Looking at maps of the Chesapeake Bay, showing the levels of phosphorous are high on the Western Side of the Bay more than the Eastern Shore Side. Taking away the Substantial use of phosphorous on the Eastern Shore does not seem to be the solution to the problem. Thank you for your concern on this critical problem in our Bay.

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OCT 21 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: Jeff Green
Address: 5650 Burnettsville Rd
Marion, MD 21838
Phone: 443-614-6638
Email: Greenie6299@yahoo.com

24

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorus Management Plan (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

This is about MONEY. The Farmers are forced to give up P Application. The state declares success to EPA on TDML. EPA says great, then MD gets CREDITS. These CREDITS will be used to build homes approved by MD officials, (developers). CREDITS are either sold or given to Developers. MORE Homes, more people, more TAXES, more roads, more Democrats. The state has taken over my farm, shut it down, then declared some other thing great has happened. It is about control money, politics.

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OCT 21 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: MAX SCITNOR
Address: 5152 Stone Boundary Rd
Cambridge Md 21613
Phone: _____
Email: _____

25

26
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

Delmarva farmers and MDA through cost share programs have made considerable investments in storage, spreading equipment and manure management tools to minimize the environmental effects of poultry litter while maximizing the benefits to soil health and crop production. The PMT will render these investments useless and require similar and redundant investments wherever the ultimate fate of the manure resource proves to be.

I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,

Signature

Philip S. Perdue

Printed Name

PHILIP S. PERDUE

Street Address

5183 WASTE GATE RD

City, State, Zip

PARSONSBURG, MD 21849

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OCT 21 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

27

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

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I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,

Signature Gerald C. Ketterman
Printed Name Gerald C. Ketterman
Street Address 9957 Norris Twilley Rd
City, State, Zip Delmar, Md 21875

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OCT 21 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

28
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

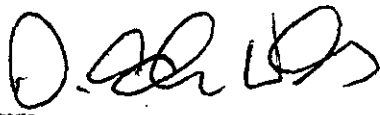
Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

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I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,


Signature

Printed Name DAVID ANDREW WILKINS

Street Address 210030 PEMBERLEN DR

City, State, Zip SALISBURY, MD 21801

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OCT 21 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorus Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



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Dear Secretary Hance:

The science that vmd has been performed in the past ten years has not come to the conclusion or confirmed sciences that proves the PMT will enhance or remove Phosphorus from the soil. The PMT will have a very large negative economic impact on poultry producers who will be forced to transport their manure off their farm. A economic impact study needs to be completed with farmers all over the state before implementation of this proposed change.

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OCT 22 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

TOMMY & DONNA SMITH
2003 BUSIE CHURCH ROAD
MARYDEL, MD 21649

Name:

Address:

Phone:

Email:



donnaandissmith@hotmail.com

29

Secretary of Agriculture Eaddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

This new regulation will be a huge financial loss for my family. We are chicken growers and will not be able to pay to have our manure shipped off site. Now the farmer pays us to take it. So that is income!!

Also if the chicken companies pay 1/2 where do you think they will get money. Let me tell you "My income from growing chickens" So in turn they will be paying me and others with our own money.

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OCT 22 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: Sherry Collier
Address: 11034 Kattys Corner RD
Cordova, Md 21625
Phone: 410-310-9842
Email: Sherry1collier@aol.com

30

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Pesticide Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

I Feel that there should be more study done on this before any decisions on made and new proposals are put in place. I feel everybody's livelee hood is going to be put in danger with the after effects if a new law or plan is put in place and has not been effectively been studied correctly. I work for Crop Production Services and have been in the Agriculture Industry for over 40 years and have seen what the Farmers have done and are doing to comply with the programs to control the nutrients being put on the ground.

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OCT 22 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,
Name: John C. Willoughby
Address: 6006 Greenview Ct.
Seaford De 19973 (Georgetown MD. Dorchester Cty)
Phone: 410-726-3077
Email: Chuck.Willoughby@cpsagu.com

(31)

(32)

To A. Mercer, Esq.

Administrator, NMP

Md. Dept. of Agriculture

50 Harry S. Truman Pkwy

Annapolis, Md. 21401

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

10/13/13

Dear Mrs. Mercer,

I am writing to oppose the requirement that all Md. NMP farms use the PNT. This will burden farm operations in Wicomico Co by using poultry litter as an organic fertilizer. I started growing poultry in 1952, grew for 47 years, using poultry litter on my corn that is rotated with soybeans every year. At present time I am spreading 125 tons per acre as a source of N, P, & K. I am using no-till and planting cover crop behind corn crop.

The cost to replace poultry litter will cost \$150-200⁰⁰ per acre, at present time I am growing 215 ac. corn and 210 ac. of soybeans. I have 192 ac. in CRP protecting the Ches. Bay and I serve on Gwyns Watershed and Lower Watershed as manager, I use a manure shed and have investments in tractor-loaded, spinner spreader, dump truck, and no-till drill coater-caster. The PNT will render ^{these} investments useless.

I urge you to delay this new PNT and enable testing to find replacements for organic fertilizer that will be outlawed on most soils.

Thank You, Lloyd E. Birmingham (443-235-6119)
4570 Powell School Rd. - Parsonsburg, Md. 21849

33

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

Delmarva farmers and MDA through cost share programs have made considerable investments in storage, spreading equipment and manure management tools to minimize the environmental effects of poultry litter while maximizing the benefits to soil health and crop production. The PMT will render these investments useless and require similar and redundant investments wherever the ultimate fate of the manure resource proves to be.

I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,

Signature

Andrew W Booth

Printed Name

Andrew W. Booth

Street Address

8402 Hilda Drive

City, State, Zip

Salisbury, MD

21804

10-12-13

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
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34

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Annapolis, MD 21401

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Sincerely,

Signature

Tammy S. Pollock

Printed Name

Tammy S. Pollock Teaspoon Farm

Street Address

26657 Solom Rd.

City, State, Zip

Salisbury, Md. 21801

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

35

October 19, 2013

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Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Denise Calloway
CLAY ISLAND FARMS

Signature

Denise Calloway

Printed Name Denise G. Calloway

Street Address 8540 Athol Rd

City, State, Zip Mardela Springs MD 21837

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MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

36

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

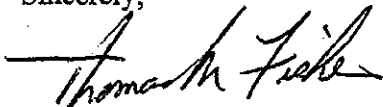
Dear Mrs. Mercer,

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I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,



Signature

Printed Name THOMAS M. FISHER

Street Address 27023 PEMBERTON DR.

City, State, Zip SALISBURY, MD. 21801

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

37

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

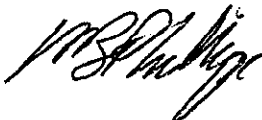
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Sincerely,



Signature

Printed Name Michael B. Phillips

Street Address 24668 Nan Wicks Rd.

City, State, Zip Quaker Hill, Md. 21856

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

38

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Sonya Brittingham

Signature *Sonya Brittingham*

Printed Name Sonya Brittingham

Street Address 7925 Pittsville Rd. PO Box 109

City, State, Zip Pittsville, MD. 21850

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OCT 22 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

As a certified Farmer trained to write our own NHP, I have not been instructed how to use the new PMT yet. How can we implement something we don't know how to use? The regulations change faster than we can learn how to use them!

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OCT 23 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,
Name: Bobbie Reed
Address: 12591 Kibler Rd.
Greensboro, MD 21639
Phone: 410-482-2217
Email: Winterhawk411@aol.com

39

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Plan (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

Expecting that we would be restricted from applying our own poultry manure on our permanent pasture & hay fields, 2 yrs. ago I used only commercial fertilizer. The yield did not change & the cost was equal to the cost of buying all the hay for our cattle at commercial prices. I simply cannot afford to do this! We only receive free cleanout in return for our manure. Our permanent grass & manure applications have built up the organic matter in our soils from 1.08 to 3.20. This helps reduce nutrient runoff from the soils. I will have to discontinue building my soils if manure application is prohibited. Please take the time needed to fully evaluate this regulation & the impact it will have on the farmers.

Sincerely,

Name: Danny Reed
Address: 12591 Kibler Rd.
Greensboro, MD 21639
Phone: 410-482-2217
Email: Winterhawk410@aol.com

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NOV 23 2013

Our Farms, Our Future

DEPARTMENT OF AGRICULTURE

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Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

Please don't act hastily on pressure from environmental groups. Don't enact detrimental regulations based on "junk science!"

RECEIVED

OCT 23 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Name: *John F. Luthy III* Sincerely, (Jock) (41)
Address: *4508 Maple Dam Rd.*
Phone: *410 463 0985*
Email: *poppa.paradise@gmail.com*
John F. Luthy III
4508 Maple Dam Rd.
Cambridge, MD 21613

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Pesticides Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

Why CAN'T you do something for the good of AN industry instead of MAKING EVERY thing more difficult. The Dept. of Environment is the mortal enemy of every crop and livestock farmer in the country and all you can do is wipe the ~~dead~~ spit from their lips.

These people don't care about clean water, it's just AN excuse to get more power for themselves and push their agenda.

The PMT is just another tool towards that end.

RECEIVED

OCT 23 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: HARRY C. TAYLOR

Address: 10305 Caleb Rd.
Berlin, MD. 21811

Phone: _____

Email: _____

42

43
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

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Sincerely,

Signature

Printed Name

Lusia A. Farlow

Street Address

302 Parker Road

City, State, Zip

Salisbury Md.

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

44

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

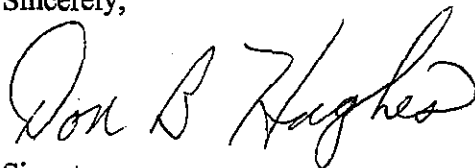
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Sincerely,



Signature

Printed Name Don B. HUGHES

Street Address 28128 VAN TASSEL WAY

City, State, Zip SALISBURY, MD. 21801-2570

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

45
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature Miriam B. Hughes
Printed Name MIRIAM B. HUGHES
Street Address 27538 NANTICORE RD.
City, State, Zip SALISBURY, MD 21801

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

46

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Leslie White Hughes

Signature

Printed Name Leslie White Hughes

Street Address 708 Burning Tree Cir

City, State, Zip Salisbury MD 21801

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

47

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

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Sincerely,

Signature Richard W. Leavitt
Printed Name Richard W. Leavitt
Street Address 32104 Huntly Circle
City, State, Zip Salisbury, MD 21804

Dear Dr. Mercer:

I do not entirely agree with this letter prepared by the Farm Bureau.
(I am not a farmer and belong to the Bureau only for an insurance benefit).

It seems to me — as a somewhat objective outside observer — that both parties appear unduly dogmatic.

Proposed MDA requirements clearly would be financially burdensome and aggravatory.

On the other hand, we cannot consistently delay, postpone, and obstruct cleaning up the Bay.

There must be a way to phase this program in gradually, or to come to a common-sense workable solution acceptable to all.

Sincerely,
Richard W. Leavitt

48

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401


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Sincerely,

Signature 
Printed Name DAVID M BARNES
Street Address 35795 WOODYARD RD
City, State, Zip WILLARDS, MD 21874

RECEIVED
OCT 23 2013
MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

49
October 19, 2013

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Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Kathleen M. Adkins

Signature

Printed Name KATHLEEN M. ADKINS

Street Address 7890 ROCKAWALKIN ROAD

City, State, Zip HEBRON, MD 21830

RECEIVED

OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

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October 19, 2013

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Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature Arthur R. Marvel
Printed Name ARTHUR R. MARVEL
Street Address 275 JOHNSON RD
City, State, Zip SALISBURY, MD 21804

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

51
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Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature

Lloyd T. Gregory

Printed Name

Lloyd T. GREGORY

Street Address

505 Archer Ave

City, State, Zip

Salisbury, MD 21804

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
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Sincerely,

Bruce Callaway

Signature

Printed Name BRUCE CALLAWAY

Street Address 5461 LOCH NESS TERRACE

City, State, Zip SALISBURY, MD. 21801

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
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Sincerely,

Signature

Andrea H. Williams

Printed Name

Andrea H. Williams

Street Address

25335 Fairway Drive

City, State, Zip

Quantico, MD 21356

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

54

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

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I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely, *Mrs. Mercer,*
I trust you shall give this matter your upmost attention and; delay the implementation of the New PMT. Poultry Litter to the farmers is a soil improvement and a money saver.

Signature *Q. Gorman Brittingham* *Q. Gorman Brittingham*

Printed Name Q. Gorman Brittingham

Street Address 4820 Powell School Rd

City, State, Zip Parsonage Md 21849

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM

55

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

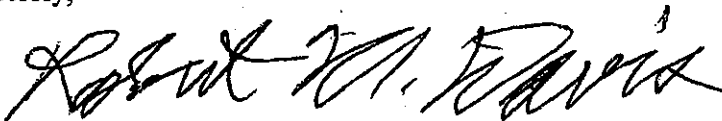
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Sincerely,



Signature

Printed Name _____

Street Address _____

City, State, Zip _____

ROBERT M. DAVIS
34324 WANGO ROAD
PARSONSBURG MD 21849

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

56
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature

Albert L. Murray

Printed Name

ALBERT L MURRAY

Street Address

27606 OCEANGATEWAY

City, State, Zip

HEBRON, MD. 21830

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

57
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature

Printed Name LAURENCE TOWNSEND JR.

Street Address 32744 Mt. Olive Rd.

City, State, Zip Salisbury, Md. 21804

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

58

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature

Printed Name Shirley Townsend

Street Address 32744 MT. Olive Rd.

City, State, Zip Salisbury, Md. 21804

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OCT 23 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorus Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association.



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

If there are fields with a FIV of 150 or greater and there have been continuous soil tests and the FIV has not changed even though no manure or P-based fert has been applied how does MDA prove the phosphorus is moving from the soil? I have soil tests which prove the phosphorus is not leaving the soil, How will the PMT enhance what I am already doing on those fields.

RECEIVED

OCT 24 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Sincerely,

Name:

Address:

Phone:

Email:



donnalandissmith@hotmail.com

5a

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorus Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

These new regulation if implemented would harm my farming operation in so many ways. It would be harder to compete with neighboring states. It would cost us more man power as well as dollars. We would be less efficient the list goes on. I am not in favor of the PMT regulation or know of anyone who is.

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OCT 24 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: Glen Holland

Address: 1932 New Bridge RD
Pocomoke MD 21851

Phone: 410-957-2146

Email: _____

(6)

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Deborah Ford

Signature

Printed Name Deborah Ford

Street Address 802 Crossbow Ct

City, State, Zip Salisbury MD 21804

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OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

162
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature

Printed Name Glenn Starkli Jr

Street Address 5016 Clark Canning House Road

City, State, Zip Federalburg MD 21632

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OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

U3

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Tracy A. Patey

Signature

Printed Name

Tracy A. Patey

Street Address

5560 Baker Rd

City, State, Zip

Willards MD 21874

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OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

64
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature Fred C. Althaus
Printed Name FRED C. ALTHAUS
Street Address 27110 PATRIOT DR.
City, State, Zip SALISBURY, MD 21801

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OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

65
October 19, 2013

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Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature Melody W. Hudson

Printed Name Melody W. Hudson

Street Address 14810 Baker Road

City, State, Zip Delmar, DE 19940

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OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

66

October 19, 2013

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Maryland Department of Agriculture
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Sincerely,

Signature Mark A. Hodson
Printed Name Mark A Hodson
Street Address 14860 Baker Road
City, State, Zip Delmar, DE 19940

RECEIVED

OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

67

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401


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Sincerely,

Signature 
Printed Name Chelsea Hudson
Street Address 14860 Baker Rd
City, State, Zip Delmar DE 19940

RECEIVED

OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

68

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

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Sincerely,

Signature



Printed Name

Christopher A. Hudson

Street Address

14931 Baker Rd

City, State, Zip

Delmar DE 19940

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MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

62

October 19, 2013

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Sincerely,

Signature

Megan Hudson

Printed Name

Megan Hudson

Street Address

14931 Boxer Road

City, State, Zip

Delmar, DE 19940

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MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
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70
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Annapolis, MD 21401

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Sincerely,

Marguerite Davis

Signature

Printed Name Marguerite Davis

Street Address 35414 E Line Rd

City, State, Zip Willards MD 21874

RECEIVED

OCT 24 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

October 22, 2013

The Honorable Earl F. Hance
 Secretary of Agriculture
 Maryland Department of Agriculture
 Annapolis, MD 21401

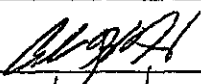
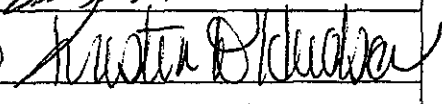
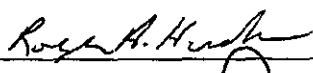
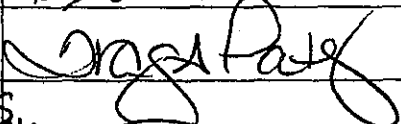


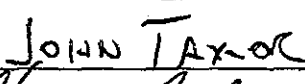
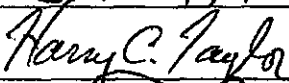
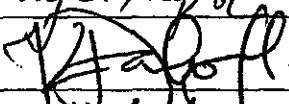
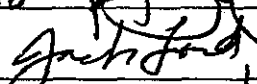
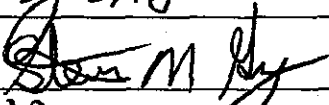
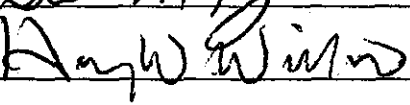
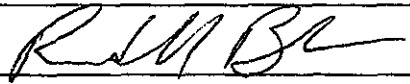
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OCT 24 2013

OFFICE OF THE SECRETARY

Dear Secretary Hance:

We, the undersigned farmers and rural residents, would like to go on record in opposition to the Phosphorus Management Tool/Nutrient Management regulation recently proposed by the Maryland Department of Agriculture. We believe the economic impact of proposal on the poultry and grain farmers in our region is too great. We request that you delay action on the PMT until the economic impact can be accurately assessed and mitigated and until meaningful discussions with affected farmers can be conducted.

	Name	Address	Signature
71	Alan Hudson	9101 Logtown Rd Berlin MD 21811	
72	Kristen B. Hudson	9101 Logtown Rd Berlin MD 21811-2229	
73	Roger Hudson	9178 Old CC Rd. Berlin MD	
(63)	Tracy A Patey	5560 Baker Rd Willards MD 21874	
74	Michelle Chesnik	8128 Greenbush Rd Willards MD 21874	
75	Paul D. Chesnik	8128 Greenbush Rd Willards MD 21874	
76	John Taylor	10304 Caleb Rd Berlin MD	
77	Harry C. Taylor	10308 Caleb Rd Berlin MD	
78	Kathryn Danko Lord	9021 Whiteville Rd Whiteville MD 21872	
79	Jack Lord	1111	
80	Steven M Gray	12627 Toll Rd Whiteville MD 21872	
81	Harry W Wimbran	P.O. Box 280 Whiteville Md 21872	
82	JOHN BRUNING JR	5336 Taylor Rd Snow Hill MD 21863	
83	Randy Blevins	1128 Snow Hill Rd Stockton MD 21864	

	Name	Address	Signature
84	John Winkler	5841 Thompson Towne East New Market	
85	Lebby Handegager	962 Revere Road Vienna, Md 21802	Lebby Handegager
86	Richard Hutchinson	11229 Lemington Rd Cordova, Md 21625	Richard W Hutchinson
87	Paul T Swann	30411 Matthews Town Rd Easton, MD	Paul T Swann
88	Alank Hutchison Sr	22646 Hickum Acres Rd Cordova Md 21625	Alank Hutchison Sr
89	Ethan Hutchison	9605 Chapel Road Easton MD 21601	Ethan Hutchison
90	Paul Hutchison Sr	9601 Chapel Rd Easton Md 21601	Paul Hutchison Sr
91	Mike Lynn	110 CLARK'S COURT Corryville, MD	Mike Lynn
91	Tim Pitkin	232 Ashland Dr Rockville, MD 20850	Tim Pitkin
92	Rich Johnson	281 Falls Rd Rockville, MD 21661	Rich Johnson
93	Wilbur Levenson	14902 Davis Rd Goldshere, Md 21636	Wilbur Levenson
94	JD Crook	1229 Hope Rd Curtisville, MD 21634	JD Crook
95	Mark Ebergsaen	3504 Little Creek Court East New Market Md 21631	Mark Ebergsaen
96	Lee Lyons	5349 Wellington Dr Trappe, MD 21673	Lee Lyons
97	Mary Beth Carotta	2205 N. Phil. Ave #2030, Ocean City, MD	Mary Beth Carotta
98	Robert Mills & McTernan	25786 Auction Rd. Fed. MD 21634	Robert Mills & McTernan
99	HARMONY FARM LLC	24716 Auction Rd. Fedorakburg, Md 21632	Harmony Farm LLC
100	Nicolas Nemi	8880 Whitesp. Ct Parsonsburg, MD 21849	Nicolas Nemi
101	Coral P Lee	307 A N D R Berlin md 21811	Coral P Lee

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S. B. FARMS, INC.

7010 Hynson Road
Hurlock, Maryland 21643
Ph. 410-754-5821
Fax 410-754-5822
Email: bison95@wildblue.net



10/25/13

RECEIVED

OCT 25 2013

OFFICE OF THE SECRETARY

Mr. Earl Hance, Secretary
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401

RE: Phosphorus Management Tool

I am writing in opposition to the implementation of the proposed PMT. Following is a list of reasons these regulations should not be implemented without much greater research and analysis.

- The PMT uses "soil saturation" rather than "crop removal" as a measure to determine if a farmer can apply P. – **Question** - how are results of this shift going to be measured? How will this affect crop production?
- The PMT was developed to control the use of organic manure – mostly chicken manure. It is estimated the PMT will disallow the use of 250 thousand tons of chicken manure on at least 100,000 acres on the Lower Shore alone.
Question: Where will all of this manure go? At 24 tons per load with a transport cost share of \$2.66 / ton it is not cost effective to haul to other regions. Also it would take about 28 loads / day, every day of the year to move it all.
Question: By not allowing the use of chicken manure, farms will have to purchase commercial N at an estimate cost of \$75 / acre. That amounts to \$7.5 million on only 100,000 acres. Why wasn't a cost / benefit analysis completed to show the additional costs to the state's ag community?
- Organic manure N is slow release as compared to commercial N. This slow release allows the crop to use it throughout the growing season and has a positive 25% - 30% effect on yield. No analysis has been done on the overall impact to the Bay of substituting commercial water-soluble nitrogen for the slow-release organic nitrogen currently used. In a wet spring, like the one experienced in 2013,

we could end up with a nitrogen impact on the Bay in the effort to limit Phosphorus under the new tool.

- Many producers use organic manure on certified organic crop land. If the FIV is 150 or greater the producer can no longer use manure and will have to purchase commercial fertilizer – thereby losing their organic certification.
- The University of Maryland presented MDA with 4 options to provide research for the PMT regulations. A (in depth) - \$351.7+ thousand over a 3 year period, B (mediocre) - \$334.3+ thousand over a 2+ year period, C (bare bones)- \$140.8+ thousand over a 2 year period or D(time table driven) - \$80.5 thousand over an 8 month period. MDA opted for option D.

Question: Why was the shortest (time table driven) research period chosen? Why was the PMT a rushed program all the way thru? Why was the PMT pushed thru under “emergency enactment”? Was all of this done to “fit” someone’s timeline?

- Why weren’t these proposed regulations routed thru the normal legislative process? This would have allowed expert testimony, rebuttal, public comment, discussion, cost analysis, funding considerations, etc.
- A regional committee is expected to be formed to create a PMT for the Chesapeake Bay watershed region. However, the proposed phosphorous savings will not be included in the next version of EPA’s TMDL database until 2017.

Question: How will anyone know if the PMT is working? Why enforce this now – why not wait until the data can be included in the database so Maryland farmers can get credit for it?

- All of these questions and concerns need to be addressed and the best avenue for this to happen is to present the proposed PMT regulations to the Maryland legislature. This will assure all facets, including cost analysis, will be conducted to determine the true cost and value of these proposed regulations. The farming community is extremely concerned about our continued viability in light of these proposed regulations. The anticipated additional costs to farmers for cleanout, replacement fertilizer or new equipment could mean the difference between making a mortgage payment or not. Between failure of a business or not. Implementation without additional time to plan will have a meaningful and negative impact on the economy of the entire eastern shore.

Wm. J. Edwards,
Wm. J. Edwards
President, S. B. Farms

103
10/23/2013

RECEIVED

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

OCT 25 2013

OFFICE OF THE SECRETARY

Dear Secretary Hance:

I am a poultry farmer who lives in Somerset County MD. and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.

- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Clifton G. Taylor III
Marion Station, MD.

MY CELL 443-614-9566

IF YOU HAVE ANY QUESTIONS,

FEEL FREE TO CALL.

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Plan (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

1. P is not an urgent nutrient. Take your time to get it right & regain ag's trust.
2. Infrastructure to haul/distribute inorganic fertilizers etc. not in place.
3. BIG economic impact not defined or explored.
4. Researchers admit science is incomplete & significant changes will be forthcoming.
5. Pushing this forward for political reasons will backfire. Maryland is and will continue to be seen as an ag and business friendly state. This adds to that.
6. Simply - this is morally, ethically, scientifically & economically wrong.

RECEIVED

OCT 25 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Name: Kevin Bounds
Address: 379 Deep Shore Rd
Seaton MD 21629
Phone: 410.430.1001
Email: K.Bounds@NOTFC.com

104

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

This would be detrimental to the agricultural community. I work and correspond with farmers everyday who say this regulation would hurt their business.

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OCT 25 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Sincerely,
Name: Tia Wilson
Address: _____
Phone: _____
Email: _____

105

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

*This would be detrimental to the
Ag. community. Harmful to their business.*

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OCT 25 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Name:

Address:

Phone:

Email:

Helene Pendleton ^{Sincerely,}

106

07
October 19 2013

To: Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkway

Dear Dr. Mercer,

Regarding the use of a new Phosphorus Management Tool, it is my understanding it is untested, or **at least needs more testing prior to real-time utilization**. Here on the DelMarVa, farmers know and understand how to properly manage chicken litter, utilizing it as a truly natural, organic form of fertilizer. Why would the Maryland Department of Agriculture advocate limiting its use and allow (or force) the agriculture community to purchase commercial grades of fertilizer?

I cannot speak to the availability of trucking resources, but we found out very early, shipping it out via rail has limitations and hidden cost much like all transportation methods.

We do know Maryland agriculture has led the way nationwide in all leading indicators of soil conservation and preservation, as well as proper nutrient usage. Nutrient management has been on the forefront of the Maryland ag scene for a very long time, and we know Maryland has made huge steps in reducing and eliminating phosphorus overloads, and everyone has benefited from the cost share programs.

Please work closely with the grass root level organization Maryland Farm Bureau prior to implementation of the new tool.

Sincerely


Milt Catlin

725 Main Street
Sharptown MD 21861.

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OCT 25 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

108
October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

Delmarva farmers and MDA through cost share programs have made considerable investments in storage, spreading equipment and manure management tools to minimize the environmental effects of poultry litter while maximizing the benefits to soil health and crop production. The PMT will render these investments useless and require similar and redundant investments wherever the ultimate fate of the manure resource proves to be.

I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,



Signature

Printed Name Timothy S. Curry
Street Address 8185 White Lowe Rd.
City, State, Zip Salisbury, MD 21807

RECEIVED

OCT 25 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard. Kevin Anderson - President, Maryland Grain Producers Association.



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

This regulation is ridiculous and potentially devastating! We use manure on our fields and it saves us a lot of money from having to buy fertilizer. Some years this savings is our profit! Does the state want to put us out of business? Don't chicken manure organic and potential runoff less than what nitrogen would be that we would have to use instead. And what am I supposed to do with the manure if I can't spread it? I am beginning to think I live in the new Soviet Union.

Sincerely,

Name: _____

Address: _____

Phone: _____

Email: _____

109

Our Farms, Our Future

110



Eastern Shore Forest Products, Inc.

**3667 St. Lukes Rd.
Salisbury, MD 21804
(410) 742-5540
(410) 548-7136 Fax**



10/25/2013

Dear Mr. Hance,

I am writing you for the first time ever in the more than 30 years of doing business on the Eastern Shore of Maryland. I am the owner of Eastern Shore Forest Products, Inc., a small forest products business with 65 employees. We directly contribute approximately \$20 mm annually to the economy of Maryland.

The main reason for my letter today is to voice concern about the proposed use of the Phosphorus Management Tool (PMT) and the likely devastating effect on the local and state economy. A full one third of my companies revenues come from directly supplying wood products to the poultry industry.

Removing the ability to use organic Fertilizer (Poultry Litter) on the shore's cropland would be devastating to the poultry segment which would ultimately have a domino effect on the entire Eastern Shore economy from grain farming to employment to allied industries.

I know that there is pressure from environmentalist to basically, "*Do something even if it's wrong*" and unfortunately, here in Maryland we have a bad habit of following just such advice. If the science conclusively shows that utilizing the current nutrient management tools and conservation practices are not sufficient, and I do not believe we have sufficiently proven that this is the case, then we must develop a plan to do a better job.

Should it be sufficiently proven in the future, through sound science, that poultry litter use must be curtailed, at that time, before we should pass any laws governing its use, we must have sound solutions in hand. Simply mandating that a large swath of the Lower eastern Shore be basically banned from applying litter without firm solutions in hand for economically dealing with the newly created surplus is just plain absurd.

Having been in business for 34 years I have learned that it is unreasonable for me to ask any of my good people to do a task when I have not figured out ahead of time, what tools and training they would need to accomplish the task. I also cannot expect good results if my people are told to do something without them understanding why we are doing it and to have a voice and buy in, in the decision. While I can get results thought the "Because I Said So!" approach, those results would not be efficient, long lasting or pleasant for anyone involved.

I believe we need to work together to find multiple solutions to the concerns of the environmental community, which by the way is actually to a large degree, the *farming*

community and use sound, unquestionable science to determine if these concerns are even valid in the first place. We cannot do justice to the people of this state if we make decisions to appease a certain group of lobbyist and environmentalist, then drag the Agricultural community through the mud of the regulations, basically, kicking and screaming.

Solutions:

At this point, we need to step back and focus on the science and make sure that all parties agree to a problem even existing in the first place. Once it is determined there is an actual problem, all stakeholders must come together and agree on solutions to that problem.

I believe that no one is better prepared to solve industries problems than the industry itself. We are on the ground so to speak and understand what can and cannot work, as well as the potential implications beyond just the original problem. The wrong approach to the issue could have consequences that far outweigh the original problem.

A strong, financially viable industry is paramount to getting proper solutions in place. Laws passed without solutions serve only to weaken an industry and a community, which in turn makes it even more difficult to reach solutions.

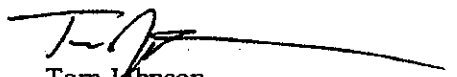
It seems that whenever an issue arises and there is the smell of forced money in the air, we are inundated by folks with a solution to our problem. They seem sometimes to be like the proverbial sharks smelling blood in the water. Unfortunately what many of these so called solution providers lack is an understanding of our industry and what can reasonably be done. It seems that the only problem some of these folks plan to solve is their own money problems or the lack thereof.

One such solution I hear much about is the mass burning of poultry litter. While most of the world is concentrating on turning energy into fertilizer in order to feed their people. We are trying to turn good quality organic fertilizer into energy. This is not only crazy it should be embarrassing!

I have a hard time getting past the fact that we have this wonderful organic source of fertilizer readily available, and our state wants to mandate that we dispose of it and use some chemical fertilizer instead. Where on earth is the science that backs this?

Mr. Hance, I have always thought that the office of the Secretary of Agriculture was in place to be the voice of Agriculture in our state and to provide guidance to our elected officials. Please be the reasonable voice of Maryland Agriculture, stand up for the facts and clearly point out the areas that are lacking facts. We need to absolutely be sure of the science and have solutions in hand before we force anymore regulation on the Agriculture community.

Respectfully,



Tom Johnson
President
Eastern Shore Forest Products, Inc.